

# Position paper on the revision of the Tobacco Products Directive 2014/40/EU

Joint position of the EU-wide Filter the Future coalition on addressing the environmental impacts of the tobacco industry.

## Executive summary

The environmental footprint of tobacco products, including filters, is now well documented and cannot be disentangled from the broader public health agenda. Integrating environmental considerations into the ongoing EU Tobacco Product Directive 2014/40/EU revision is indispensable to ensuring a coherent and evidence-based regulatory framework.

As a coalition of both environmental and health organisations from civil society, including youth-led organisations, we fully support the revision of the EU Tobacco Products Directive. However, we recommend that it insert and explicitly address the environmental impact of the tobacco industry through the following measures:

- Introduce environmental warnings on cigarette packs, roll-your-own tobacco and electronic cigarettes, alongside existing health warnings;
- Require the inclusion of both health and environmental messages directly on cigarette papers, following the example of the new Canadian legislation;
- Establish a clear and progressive phase-out of plastic and no-plastic cigarette filters, which worsen the effects on health and the environment;
- Strengthen and clarify Extended Producer Liability (EPL) mechanisms for tobacco products, ensuring that producers fully cover the environmental and waste management costs associated with their products;
- Require environmental impact assessments, in addition to health assessments, prior to the placing on the market of new tobacco products and additives.

## Key (scientific) data

Scientific evidence highlights the environmental impact of the tobacco industry. We consider it particularly relevant to recall that:

- Cigarette filters were never designed to make smoking safer. They were invented in the 1950s as a marketing trick, as a way to reassure smokers as evidence of lung cancer grew undeniable, and [to promote an alternative to quitting](#). It deliberately changed perception. Internal industry documents exposed the strategy in [blunt terms](#): “the illusion of filtration is as important as the fact of filtration.”



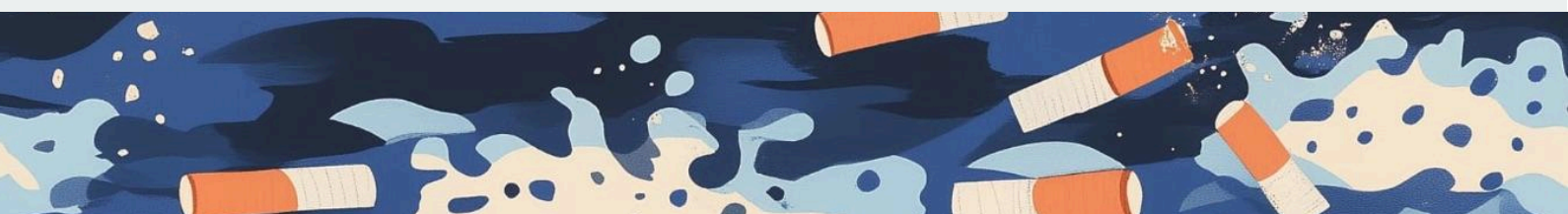
- Scientific evidence shows that cigarette filters provide no health benefits, and may make smoking more dangerous: scientific evidence has consistently shown that cellulose acetate filters [have shifted lung cancer](#) types (to adenocarcinomas). Rather than reducing risk, they increase the amount of [inhaled microplastics](#), while imposing substantial environmental and [financial burdens](#) on local communities.
- Approximately 800 chemical constituents [are identified](#) in fresh and saltwater cigarette butt leachates. Nicotine, a proven pesticide, is the most abundant chemical. Cigarette butts should be classified as hazardous waste, according to the WHO Framework Convention on Tobacco Control Article 18.
- The [cigarette production stage](#) is highly detrimental to the environment in terms of deforestation (tobacco farming accounts for about 5% of total deforestation), land exploitation, water consumption, and the use of fertilisers and energy.
- Around [4.5 trillion cigarette butts are littered every year](#) worldwide. It's the most abundant single item of plastic and toxic litter. That's enough to fill 60,000 shipping containers and 30 cargo ships.
- Cigarette butts [degradation times](#) vary from 5 years in different laboratory and field conditions to 7.5 years in compost and 14 years on soil surface.
- Many smokers [don't perceive butts as litter](#). The belief that butts are biodegradable and not harmful is strongly predictive of littering behavior: [education should emphasize](#) that cigarette waste is toxic, non-biodegradable, plastic, and ecologically damaging. Introducing harmonised environmental warnings directly on products or their components would contribute to both consumer awareness and upstream prevention.
- The tobacco industry tries to shift the blame onto smokers, while concealing the fact that they are responsible for the production of their waste. They [created campaigns](#) to deflect responsibility for cigarette litter and maintain social acceptability.
- A stronger alignment between health, environmental, and circular-economy policies would enhance the coherence and efficiency of the EU regulatory framework. It would align with the desire to break down silos and implement policies from a One Health perspective.
- Public support for ambitious measures targeting tobacco-related pollution is high across Member States, and reinforces the legitimacy of decisive regulatory action.

Taken together, these data underline that the environmental footprint of tobacco products extends across their entire lifecycle, from cultivation and manufacturing to consumption and waste management.

## Political context

The European and international policy context is calling for stronger environmental protection.

Since the entry into force of the EU Tobacco Products Directive in 2014, scientific warnings regarding deforestation, chemical pollution, plastic contamination of waters and soils, and biodiversity loss have



become increasingly urgent. In response, the European Union has adopted a series of legislative and strategic frameworks aimed at addressing these systemic environmental challenges.

Ongoing and forthcoming EU policy processes also provide a strategic opportunity to better align public health, environmental protection, circular economy and ocean governance objectives.

Addressing the environmental footprint of tobacco products is fully consistent with the European Union's commitments under the following frameworks:

#### Revision of the Single-Use Plastics Directive (EU Directive 2019/904)

This directive aims to prevent and reduce the impact of certain plastic products on the environment, particularly the aquatic environment. It explicitly recognises cigarette filters containing plastic and introduces extended producer responsibility schemes for tobacco products. Strengthening environmental provisions in the TPD would reinforce coherence with these objectives.

#### European Ocean Pact

The Pact seeks to strengthen the protection and sustainable management of marine ecosystems. Reducing plastic and toxic pollution from tobacco products directly contributes to ocean health and marine biodiversity protection.

#### Global Plastics Treaty (under negotiation)

At the international level, ongoing negotiations toward a legally binding Global Plastics Treaty reinforce the need for coherent and ambitious action on all major sources of plastic and toxic pollution. Addressing cigarette filter pollution is aligned with these global efforts.

#### EU Water Resilience Strategy

This strategy aims to improve water quality, reduce pollution at source, and enhance ecosystem resilience. Limiting the release of hazardous substances from tobacco product waste supports these objectives.

#### Regulation on deforestation-free products (Regulation (EU) 2023/1115)

This regulation seeks to ensure that products placed on the EU market do not contribute to global deforestation. Considering the documented link between tobacco cultivation and deforestation, greater policy coherence is warranted.

#### European Green Deal

The Green Deal establishes the EU's overarching commitment to climate neutrality, pollution reduction and biodiversity protection. Integrating environmental considerations into tobacco regulation is consistent with its systemic approach.



## Zero Pollution Action Plan

This plan sets targets to reduce air, water and soil pollution to levels no longer harmful to health and ecosystems. Reducing plastic and chemical pollution from tobacco products directly contributes to this objective.

## Sustainable Development Goal 14 – Life Below Water

The EU has committed to protecting and sustainably using marine resources. Addressing one of the most prevalent forms of marine litter (cigarette butts) supports this commitment.

### **The revision of the Tobacco Products Directive (2014/40/EU)**

The ongoing revision of the EU Tobacco Products Directive provides a timely opportunity to align tobacco regulation with the European Union’s environmental acquis and strategic commitments.

While the Directive primarily pursues public health objectives, tobacco products are also associated with significant environmental externalities, including plastic pollution, chemical contamination (including substances that are ecotoxic, reprotoxic and mutagenic), and contributions to deforestation. Addressing these impacts is consistent with the EU’s broader objective of ensuring a high level of protection for both human health and the environment.

The revision also interacts with the objectives of the *EU Beating Cancer Plan*, which aims to reduce tobacco consumption and prevent tobacco-related harm. Reducing the environmental footprint of tobacco products complements public health efforts by addressing the full societal cost of tobacco consumption.

It is important to recall that tobacco products are inherently harmful, addictive and carcinogenic. Unlike essential goods, they do not fulfil a societal necessity. This reinforces the legitimacy of applying ambitious environmental standards to their production, design and waste management.

## **Recommendations**

In light of the above, it appears essential to include environmental considerations in the revision of the TPD, as part of a holistic approach in which public health and environmental protection mutually reinforce each other. These measures should be understood as progressive steps contributing to the long-term objective of an “[endgame](#)” for the tobacco industry, which represents the most effective solution to protect both the environment and human health.

In this regard, we warmly encourage the EU to adopt a triple approach:

- Adopt an action plan that aims to significantly reduce - and **ultimately eliminate - plastic and non-plastic filters**, whose environmental impacts are well established.
- Consider expanding **environmental warnings requirements on tobacco products**, including direct printing on cigarette packs, roll-your-own packs, and individual cigarettes following the example



of the recent [Canadian legislation](#). These messages shouldn't imply guilt or stigmatise: they should inform and raise awareness on the impact of Tobacco Industry (WHO FCTC [Article 12](#)), inviting people to quit smoking (and dispose of cigarette butts more safely, even if they don't have filters).

- **Reinforce the [Extended Producer Liability](#)** provisions (inspired by the Extended Producer Responsibility mechanism and WHO FCTC [Article 19](#)) to ensure that producers bear the full costs of collection, clean-up, and environmental remediation. It's necessary to ensure these schemes do not serve as tools for greenwashing, but effectively support health and environmental objectives. The tobacco industry should be totally excluded from the decision-making polluter-pay process, in accordance with article 5.3 of the WHO Framework Convention on Tobacco Control.

## Conclusion

As the United Nations Secretary-General's Special Envoy for the Ocean, Peter Thomson, stated in reference to the Filter the Future coalition's position:

*"This work comes at a crucial time for better governance of the use and disposal of plastic products. The European Union's ongoing and forthcoming policy processes provide a clear opportunity to better align public health, environmental protection and ocean governance objectives. [...] These efforts will be a force for the advance of a comprehensive response to ocean pollution in Europe and the wider world."*

---

**Filter the Future** [Filter the Future](#) (FTF) was formed in 2024, a coalition that sprouted from a gathering of European citizens and conservation advocates who decided to take initiative for the common good. Operating on a wholly voluntary basis, FTF is driven by research, environmental advocacy, and a shared conviction to protect our maritime ecosystems by holding the tobacco industry accountable for the damage it continues to cause.

In accordance with Article 5.3 of the WHO Framework Convention on Tobacco Control, members acknowledge that they have no current or past direct or indirect links with the tobacco industry, the vaping industry, and/or tobaccoists.

The European Commission's Directorate-General for Fisheries and Maritime Affairs (DG MARE) has selected the Filter the Future coalition from a pool of candidate projects across Europe for its contribution to improving the health of the world's oceans and the well-being of coastal communities. FTF is a highlight partner of the EU campaign [#MakeEUBlue: Cities In Action!](#)

An initiative incubated by



In direct response to



[filterthefuture.eu](https://filterthefuture.eu) · [contact@filterthefuture.eu](mailto:contact@filterthefuture.eu)

